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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
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11 MIKE HONDA FOR CONGRESS,

12 *Plaintiff,*

13 vs.

14 BRIAN PARVIZSHAHI, RO FOR  
15 CONGRESS, INC., ROHIT “RO”  
KHANNA, and DOES 1 through 10,

16 *Defendants.*  
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CASE NO. 5:16-cv-05416-EJD

**STIPULATION AND ~~[PROPOSED]~~  
ORDER RE: PLAINTIFF’S  
MOTION FOR PRELIMINARY  
INJUNCTION**

JUDGE: Hon. Edward J. Davila

18 WHEREAS, Plaintiff Mike Honda for Congress’ Motion for Preliminary Injunction (the  
19 “Motion”, Dkt. No. 5) was heard on Oct. 11, 2016, 1:30 pm;

20 NOW THEREFORE, the Parties hereby *stipulate* as follows:

- 21 1. Plaintiff Mike Honda for Congress and Defendant Brian Parvizshahi agree and  
22 stipulate that the Motion will not be deemed submitted to the Court pending the entry  
23 of this Stipulation and [Proposed] Order and pending compliance with the Order;  
24 2. The Motion will be deemed submitted to the Court as between Plaintiff and Defendant  
25 Parvizshahi if either Plaintiff Mike Honda for Congress or the Khanna Defendants  
26 provide(s) written notification, to the Court and the Parties, that a Party bound by the  
27 [Proposed] Order has not complied with any part of the [Proposed] Order or that the  
28 Parties bound by this Order disagree regarding the implementation of the [Proposed]

Order, whereupon the Court may (1) issue a ruling on the Motion as between Plaintiff and Defendant Parvizshahi, or (2) take any other action that it deems appropriate;

3. Defendant Parvizshahi shall not access or use Arum Group, LLC's Dropbox files pertaining to Plaintiff Mike Honda for Congress at any time or in any way throughout the entirety of this litigation;
4. Defendant Parvizshahi shall preserve all records and relevant devices currently in his possession related in any way to this litigation;
5. Within three (3) business days of the entry of this Order, Defendant Parvizshahi shall deliver to his counsel any and all devices (including but not limited to personal computers) from which he previously accessed his Dropbox account; and Defendant Parvizshahi's counsel shall provide written confirmation, to Plaintiff's counsel, of receipt of all such devices;
6. Through Nov. 8, 2016 at 8 pm, Defendant Parvizshahi shall not: (i) assist Defendant Ro for Congress, Inc. or Defendant Rohit "Ro" Khanna's campaign; or (ii) interact with any of Defendant Ro For Congress, Inc.'s employees or volunteers; however, this does not preclude Defendant Parvizshahi from voting for whichever candidate(s) he chooses in the Nov. 8, 2016 election; and
7. At this time, no findings have been made by the Court regarding the allegations in the Complaint or Plaintiff's Motion for Preliminary Injunction as to Defendant Parvizshahi. Plaintiff and Defendant Parvizshahi reserve all claims and defenses as to one another.

Accordingly, the Parties respectfully ask that the Court adopt the proposed order attached hereto.

1 DATED: Oct. 14, 2016

BUSINESS, ENERGY, AND ELECTION  
LAW, PC

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4 By: /s/ Gautam Dutta

5 GAUTAM DUTTA, ESQ.

6 ATTORNEYS FOR PLAINTIFF

7 MIKE HONDA FOR CONGRESS

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12 DATED: Oct. 14, 2016

THOMPSON COBURN LLP

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15 By: /s/ Renato Mariotti

16 RENATO MARIOTTI, ESQ.

17 ATTORNEYS FOR DEFENDANT

18 BRIAN PARVIZSHAHI

ORDER

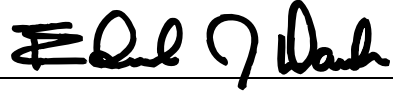
The Court hereby ORDERS the following:

1. Plaintiff Mike Honda for Congress' pending Motion for Preliminary Injunction (Dkt. No. 5) will not be deemed submitted to the Court pending the entry of this Stipulation and Order and pending compliance with the Order;
2. The Motion will be deemed submitted to the Court as between Plaintiff and Defendant Parvizshahi if either Plaintiff Mike Honda for Congress or Defendant Parvizshahi provides written notification, to the Court and the Parties, that a Party bound by this Order has not complied with any part of this Order or that the Parties bound by this Order disagree regarding the implementation of the Order, whereupon the Court may (1) issue a ruling on the Motion as between Plaintiff and Defendant Parvizshahi, or (2) take any other action that it deems appropriate;
3. Defendant Parvizshahi shall not access or use Arum Group, LLC's Dropbox files pertaining to Plaintiff Mike Honda for Congress at any time or in any way throughout the entirety of this litigation;
4. Defendant Parvizshahi shall preserve all records and relevant devices currently in his possession related in any way to this litigation;
5. Within three (3) business days of the entry of this Order, Defendant Parvizshahi shall deliver to his counsel any and all devices (including but not limited to personal computers) from which he previously accessed his Dropbox account; and Defendant Parvizshahi's counsel shall provide written confirmation, to Plaintiff's counsel, of receipt of all such devices;
6. Through Nov. 8, 2016 at 8 pm, Defendant Parvizshahi shall not: (i) assist Defendant Ro for Congress, Inc. or Defendant Rohit "Ro" Khanna's campaign; or (ii) interact with any of Defendant Ro For Congress, Inc.'s employees or volunteers; however, this does not preclude Defendant Parvizshahi from voting for whichever candidate(s) he chooses in the Nov. 8, 2016 election; and
7. At this time, no findings have been made by the Court regarding the allegations in

1 the Complaint or Plaintiff's Motion for Preliminary Injunction as to Defendant  
2 Parvizshahi. Plaintiff and Defendant Parvizshahi reserve all claims and defenses as  
3 to one another.

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5 IT IS SO ORDERED.

6 DATED: Oct. 17, 2016

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9 HON. EDWARD J. DAVILA

10 JUDGE

11 UNITED STATES DISTRICT COURT  
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